



EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX
DIRECTOR

Notice of Preparation

September 12, 2014

To: Reviewing Agencies

Re: North County Environmental Resources (NCER) Recycling Facility
SCH# 2014091033

Attached for your review and comment is the Notice of Preparation (NOP) for the North County Environmental Resources (NCER) Recycling Facility draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Beth Ehsan
San Diego County
5510 Overland Avenue, Suite 110
San Diego, CA 92123

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Attachments
cc: Lead Agency

**Document Details Report
State Clearinghouse Data Base**

SCH# 2014091033
Project Title North County Environmental Resources (NCER) Recycling Facility
Lead Agency San Diego County

Type NOP Notice of Preparation
Description The project is a recycling facility for tree branches and logs; wood and construction debris; and concrete, asphalt, and inert material (CDI) from demolition projects. Only pre-sorted, non-contaminated tree waste, wood and construction debris would be accepted for processing and there would be no composting or acceptance of solid waste. NCER is anticipated to produce two truckloads per day (approximately 48 tons per day, 15,000 net tons annually) of finished product.

Lead Agency Contact

Name	Beth Ehsan		
Agency	San Diego County		
Phone	858 694 3103	Fax	
email			
Address	5510 Overland Avenue, Suite 110		
City	San Diego	State CA	Zip 92123

Project Location

County	San Diego		
City	Escondido		
Region			
Cross Streets	Mesa Rock Road and Deer Springs Road		
Lat / Long	33° 10' 9" N / 117° 6' 44" W		
Parcel No.	187-100-23, 187-100-37, 187-100-38		
Township	11S	Range 2W	Section 32
		Base	SBB&M

Proximity to:

Highways	I-15
Airports	No
Railways	No
Waterways	No
Schools	11
Land Use	High Impact Industrial (I-3), M54

Project Issues Aesthetic/Visual; Air Quality; Biological Resources; Noise; Toxic/Hazardous; Water Quality; Other Issues

Reviewing Agencies Resources Agency; Department of Parks and Recreation; Resources, Recycling and Recovery; Department of Fish and Wildlife, Region 5; Native American Heritage Commission; California Highway Patrol; Caltrans, District 11; Air Resources Board, Major Industrial Projects; Department of Toxic Substances Control; Regional Water Quality Control Board, Region 9

Date Received	09/12/2014	Start of Review	09/12/2014	End of Review	10/13/2014
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Notice of Completion & Environmental Document Transmittal

2014091033

Mail to: State Clearinghouse, P. O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH #

Project Title: North County Environmental Resources (NCER) Recycling Facility

Lead Agency: County of San Diego

Contact Person: Beth Ehsan

Mailing Address: 5510 Overland Avenue Suite 110

Phone: 858-694-3103

City: San Diego

Zip: 92123

County: San Diego

Project Location: County: San Diego

City/Nearest Community: Escondido

Cross Streets: Mesa Rock Road and Deer Springs Road

Zip Code: 92026

Lat. / Long.: 33° 10' 9" N/ 117° 6' 44" W

Total Acres: 139.5

Assessor's Parcel No.: 187-100-23, 187-100-31, 187-100-33,

Section: 32

Twp.: 11S

Range: 2W

Base: SBB&M

187-100-35, 187-100-37, and 187-100-38

Within 2 Miles: State Hwy #: I-15

Waterways: none

Airports: none

Railways: none

Schools: eleven

Document Type:

CEQA: ☒ NOP
☐ Early Cons
☐ Neg Dec
☐ Mit Neg Dec

☐ Draft EIR
☐ Supplement/Subsequent EIR
(Prior SCH No.)
Other

NEPA: ☐ NOI
☐ EA
☐ Draft EIS
☐ FONSI

Other: ☐ Joint Document
☐ Final Document
☐ Other

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Local Action Type:

☐ General Plan Update
☐ General Plan Amendment
☐ General Plan Element
☐ Community Plan

☐ Specific Plan
☐ Master Plan
☐ Planned Unit Development
☒ Site Plan

☐ Rezone
☐ Prezone
☐ Use Permit
☐ Land Division (Subdivision, etc.)

☐ Annexation
☐ Redevelopment
☐ Coastal Permit
☒ Other BA/CC

Development Type:

☐ Residential: Units _____ Acres _____
☐ Office: Sq.ft. _____ Acres _____ Employees _____
☐ Commercial: Sq.ft. _____ Acres _____ Employees _____
☒ Industrial: Sq.ft. 12,000 Acres 35.5 Employees 18
☐ Educational
☐ Recreational

☐ Water Facilities: Type _____ MGD _____
☐ Transportation: Type _____
☐ Mining: Mineral _____
☐ Power: Type _____ MW _____
☐ Waste Treatment: Type _____ MGD _____
☐ Hazardous Waste: Type _____
☐ Other: _____

Project Issues Discussed in Document:

☒ Aesthetic/Visual
☐ Agricultural Land
☒ Air Quality
☐ Archeological/Historical
☒ Biological Resources
☐ Coastal Zone
☐ Drainage/Absorption
☐ Economic/Jobs
☒ Other Greenhouse Gas Emissions

☐ Fiscal
☐ Flood Plain/Flooding
☐ Forest Land/Fire Hazard
☐ Geologic/Seismic
☐ Minerals
☒ Noise
☐ Population/Housing Balance
☐ Public Services/Facilities
☐ Recreation/Parks
☐ Schools/Universities
☐ Septic Systems
☐ Sewer Capacity
☐ Soil Erosion/Compaction/Grading
☐ Solid Waste
☒ Toxic/Hazardous
☐ Traffic/Circulation

☐ Vegetation
☒ Water Quality
☐ Water Supply/Groundwater
☐ Wetland/Riparian
☐ Wildlife
☐ Growth Inducing
☐ Land Use
☐ Cumulative Effects

Present Land Use/Zoning/General Plan Designation:

High Impact Industrial (I-3), M54

Project Description: (please use a separate page if necessary)

The project is a recycling facility for tree branches and logs; wood and construction debris; and concrete, asphalt, and inert material (CDI) from demolition projects. Only pre-sorted, non-contaminated tree waste, wood and construction debris would be accepted for processing and there would be no composting or acceptance of solid waste. NCER is anticipated to produce two truckloads per day (approximately 48 tons per day, 15,000 net tons annually) of finished product.

Note: The state Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

January 2008

AN

NOP Distribution List

County: SAN DIEGO

SCH#

2014091033

Resources Agency

- ☒ Resources Agency
Nadell Gayou
- ☐ Dept. of Boating & Waterways
Nicole Wong
- ☐ California Coastal Commission
Elizabeth A. Fuchs
- ☐ Colorado River Board
Lisa Johansen
- ☐ Dept. of Conservation
Elizabeth Carpenter
- ☐ California Energy Commission
Eric Knight
- ☐ Cal Fire
Dan Foster
- ☐ Central Valley Flood Protection Board
James Herota
- ☐ Office of Historic Preservation
Ron Parsons

☒ **Dept of Parks & Recreation**
Environmental Stewardship Section

- ☒ California Department of Resources, Recycling & Recovery
Sue O'Leary
- ☐ S.F. Bay Conservation & Dev't Comm.
Steve McAdam
- ☐ Dept. of Water Resources
Nadell Gayou

Fish and Game

- ☐ Dept. of Fish & Wildlife
Scott Flint
Environmental Services Division
- ☐ Fish & Wildlife Region 1
Donald Koch

- ☐ Fish & Wildlife Region 1E
Laurie Harnsberger
- ☐ Fish & Wildlife Region 2
Jeff Drongesen
- ☐ Fish & Wildlife Region 3
Charles Armor
- ☐ Fish & Wildlife Region 4
Julie Vance
- ☒ Fish & Wildlife Region 5
Leslie Newton-Reed
Habitat Conservation Program
- ☐ Fish & Wildlife Region 6
Tiffany Ellis
Habitat Conservation Program
- ☐ Fish & Wildlife Region 6 I/M
Heidi Sickler
Inyo/Mono, Habitat Conservation Program
- ☐ Dept. of Fish & Wildlife M
George Isaac
Marine Region

Other Departments

- ☐ Food & Agriculture
Sandra Schubert
Dept. of Food and Agriculture
- ☐ Dept. of General Services
Public School Construction
- ☐ Dept. of General Services
Anna Garbeff
Environmental Services Section
- ☐ Delta Stewardship Council
Kevan Samsam

Independent

Commissions/Boards

- ☐ Delta Protection Commission
Michael Machado
- ☐ OES (Office of Emergency Services)
Dennis Castrillo

- ☒ Native American Heritage Comm.
Debbie Treadway
- ☐ Public Utilities Commission
Leo Wong
- ☐ Santa Monica Bay Restoration
Guangyu Wang
- ☐ State Lands Commission
Jennifer Deleong
- ☐ Tahoe Regional Planning Agency (TRPA)
Cherry Jacques

Business, Trans & Housing

- ☐ Caltrans - Division of Aeronautics
Philip Crimmins
- ☐ Caltrans - Planning
Terri Pencovic
- ☒ California Highway Patrol
Suzann Ikeuchi
Office of Special Projects
- ☐ Housing & Community Development
CEQA Coordinator
Housing Policy Division

Dept. of Transportation

- ☐ Caltrans, District 1
Rex Jackman
- ☐ Caltrans, District 2
Marcelino Gonzalez
- ☐ Caltrans, District 3
Eric Federicks - South
Susan Zanchi - North
- ☐ Caltrans, District 4
Erik Alm
- ☐ Caltrans, District 5
David Murray
- ☐ Caltrans, District 6
Michael Navarro
- ☐ Caltrans, District 7
Dianna Watson

- ☐ Caltrans, District 8
Dan Kopulsky
- ☐ Caltrans, District 9
Gayle Rosander
- ☐ Caltrans, District 10
Tom Dumas
- ☒ Caltrans, District 11
Jacob Armstrong
- ☐ Caltrans, District 12
Maureen El Harake

Cal EPA

Air Resources Board

- All Other Projects
Cathi Slaminski
- ☐ Transportation Projects
Nesamani Kalandiyur
- ☒ Industrial Projects
Mike Tollstrup

☐ **State Water Resources Control Board**

- Regional Programs Unit
Division of Financial Assistance
- ☐ State Water Resources Control Board
Jeffery Werth
Division of Drinking Water

☐ **State Water Resources Control Board**

- Student Intern, 401 Water Quality Certification Unit
Division of Water Quality

☐ **State Water Resources Control Board**

- Phil Crader
Division of Water Rights
- ☒ Dept. of Toxic Substances Control
CEQA Tracking Center

☐ **Department of Pesticide Regulation**

- CEQA Coordinator

Regional Water Quality Control Board (RWQCB)

- ☐ RWQCB 1
Cathleen Hudson
North Coast Region (1)
- ☐ RWQCB 2
Environmental Document Coordinator
San Francisco Bay Region (2)
- ☐ RWQCB 3
Central Coast Region (3)
- ☐ RWQCB 4
Teresa Rodgers
Los Angeles Region (4)
- ☐ RWQCB 5S
Central Valley Region (5)
- ☐ RWQCB 5F
Central Valley Region (5)
Fresno Branch Office
- ☐ RWQCB 5R
Central Valley Region (5)
Redding Branch Office
- ☐ RWQCB 6
Lahontan Region (6)
- ☐ RWQCB 6V
Lahontan Region (6)
Victorville Branch Office
- ☐ RWQCB 7
Colorado River Basin Region (7)
- ☐ RWQCB 8
Santa Ana Region (8)
- ☒ RWQCB 9
San Diego Region (9)

☐ Other _____

☐ _____
Conservancy

NATIVE AMERICAN HERITAGE COMMISSION

1550 Harbor Blvd., Suite 100
West SACRAMENTO, CA 95691
(916) 373-3710
Fax (916) 373-5471



September 25, 2014

Beth Ehsan
San Diego County
5510 Overland Avenue, Suite 110
San Diego, CA 92123

RE: SCH# 2014091033 North County Environmental Resources (NCER) Recycling Facility, San Diego County. .

Dear Ms. Ehsan,

The Native American Heritage Commission (NAHC) has reviewed the Notice of Preparation (NOP) referenced above. The California Environmental Quality Act (CEQA) states that any project that causes a substantial adverse change in the significance of an historical resource, which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA Guidelines 15064.5(b)). To comply with this provision the lead agency is required to assess whether the project will have an adverse impact on historical resources within the area of project effect (APE), and if so to mitigate that effect. To adequately assess and mitigate project-related impacts to archaeological resources, the NAHC recommends the following actions:

- ✓ Contact the appropriate regional archaeological Information Center for a record search. The record search will determine:
 - If a part or all of the area of project effect (APE) has been previously surveyed for cultural resources.
 - If any known cultural resources have already been recorded on or adjacent to the APE.
 - If the probability is low, moderate, or high that cultural resources are located in the APE.
 - If a survey is required to determine whether previously unrecorded cultural resources are present.
- ✓ If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure.
 - The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological Information Center.
- ✓ Contact the Native American Heritage Commission for:
 - A Sacred Lands File Check. **SFL Check Completed with Negative Results**
 - A list of appropriate Native American contacts for consultation concerning the project site and to assist in the mitigation measures. **Native American Contacts List attached**
- ✓ Lack of surface evidence of archeological resources does not preclude their subsurface existence.
 - Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) Guidelines §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
 - Lead agencies should include in their mitigation plan provisions for the disposition of recovered cultural items that are not burial associated, which are addressed in Public Resources Code (PRC) §5097.98, in consultation with culturally affiliated Native Americans.
 - Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, PRC §5097.98, and CEQA Guidelines §15064.5(e), address the process to be followed in the event of an accidental discovery of any human remains and associated grave goods in a location other than a dedicated cemetery.

Sincerely,

Katy Sanchez

Katy Sanchez
Associate Government Program Analyst

CC: State Clearinghouse

**Native American Contacts
San Diego County
September 25, 2014**

Ewiiapaayp Tribal Office
Robert Pinto Sr., Chairperson
4054 Willows Road Diegueno/Kumeyaay
Alpine , CA 91901
wmicklin@leaningrock.net
(619) 445-6315
(619) 445-9126 Fax

Viejas Band of Kumeyaay Indians
Anthony R. Pico, Chairperson
P.O. Box 908 Diegueno/Kumeyaay
Alpine , CA 91903
jhagen@viejas-nsn.gov
(619) 445-3810
(619) 445-5337 Fax

La Posta Band of Mission Indians
Gwendolyn Parada, Chairperson
8 Crestwood Road Diegueno/Kumeyaay
Boulevard , CA 91905
gparada@lapostacasino.
(619) 478-2113
(619) 478-2125

Kumeyaay Cultural Historic Committee
Ron Christman
56 Viejas Grade Road Diegueno/Kumeyaay
Alpine , CA 92001
(619) 445-0385

Manzanita Band of Kumeyaay Nation
Leroy J. Elliott, Chairperson
P.O. Box 1302 Diegueno/Kumeyaay
Boulevard , CA 91905
ljbirdsinger@aol.com
(619) 766-4930
(619) 766-4957 Fax

Campo Band of Mission Indians
Ralph Goff, Chairperson
36190 Church Road, Suite 1 Diegueno/Kumeyaay
Campo , CA 91906
chairgoff@aol.com
(619) 478-9046
(619) 478-5818 Fax

Sycuan Band of the Kumeyaay Nation
Daniel Tucker, Chairperson
5459 Sycuan Road Diegueno/Kumeyaay
El Cajon , CA 92019
ssilva@sycuan-nsn.gov
(619) 445-2613
(619) 445-1927 Fax

Jamul Indian Village
Raymond Hunter, Chairperson
P.O. Box 612 Diegueno/Kumeyaay
Jamul , CA 91935
jamulrez@sctdv.net
(619) 669-4785

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH # 2014091033 North County Environmental Resources (NCER) Recycling Facility, San Diego County.

**Native American Contacts
San Diego County
September 25, 2014**

Kumeyaay Cultural Repatriation Committee
Steve Banegas, Spokesperson
1095 Barona Road Diegueno/Kumeyaay
Lakeside , CA 92040
sbenegas50@gmail.com
(619) 742-5587
(619) 443-0681 Fax

lipay Nation of Santa Ysabel
Clint Linton, Director of Cultural Resources
P.O. Box 507 Diegueno/Kumeyaay
Santa Ysabel, CA 92070
cjlinton73@aol.com
(760) 803-5694

Viejas Band of Kumeyaay Indians
ATTN: Julie Hagen, Cultural Resources
P.O. Box 908 Diegueno/Kumeyaay
Alpine , CA 91903
jhagen@viejas-nsn.gov
(619) 445-3810
(619) 445-5337

Sycuan Band of the Kumeyaay Nation
Sydney Morris, Environmental Coordinator
5459 Sycuan Road Diegueno/Kumeyaay
El Cajon , CA 92019
smorris@sycuan-nsn.gov
(619) 445-2613
(619) 445-1927 Fax

Ewiiapaayp Tribal Office
Will Micklin, Executive Director
4054 Willows Road Diegueno/Kumeyaay
Alpine , CA 91901
wmicklin@leaningrock.net
(619) 445-6315
(619) 445-9126 Fax

Manzanita Band of the Kumeyaay Nation
Nick Elliott, Cultural Resources Coordinator
P.O. Box 1302 Kumeyaay
Boulevard , CA 91905
nickmepa@yahoo.com
(619) 766-4930
(619) 925-0952 Cell
(919) 766-4957 Fax

Manzanita Band of Mission Indians
ATTN: Keith Adkins, EPA Director
P.O. Box 1302 Kumeyaay
Boulevard , CA 91905
(619) 766-4930
(619) 766-4957 Fax

Kumeyaay Diegueno Land Conservancy
Mr. Kim Bactad, Executive Director
2 Kwaaypaay Court Diegueno/Kumeyaay
El Cajon , CA 91919
kimbactad@gmail.com
(619) 659-1008 Office
(619) 445-0238 Fax

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH # 2014091033 North County Environmental Resources (NCER) Recycling Facility, San Diego County.

**Native American Contacts
San Diego County
September 25, 2014**

Inter-Tribal Cultural Resource Protection Council
Frank Brown, Coordinator
240 Brown Road Diegueno/Kumeyaay
Alpine, CA 91901
frbrown@viejas-nsn.gov
(619) 884-6437

Kumeyaay Cultural Repatriation Committee
Bernice Paipa, Vice Spokesperson
P.O. 937 Diegueno/Kumeyaay
Boulevard, CA 91905
bernicepaipa@gmail.com

ipay Nation of Santa Ysabel
Virgil Perez, Chairperson
P.O. Box 130 Diegueno/Kumeyaay
Santa Ysabel, CA 92070
(760) 765-0845
(760) 765-0320 Fax

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH # 2014091033 North County Environmental Resources (NCER) Recycling Facility, San Diego County.

**DEPARTMENT OF RESOURCES RECYCLING AND RECOVERY**1001 I STREET, SACRAMENTO, CALIFORNIA 95814 • WWW.CALRECYCLE.CA.GOV • (916) 322-4027

P.O. BOX 4025, SACRAMENTO, CALIFORNIA 95812

October 13, 2014

E-mail: Beth.Ehsan@sdcounty.ca.gov

Beth Ehsan, Project Manager
County of San Diego, Planning & Development Services
5510 Overland Avenue, Suite 110
San Diego, CA 92123-1239

Subject: SCH No. 2014091033 - Notice of Preparation of a Draft Environmental Impact Report and Notice of Completion of an Initial Study for North County Environmental Resources (NCER) Recycling Facility, San Diego County

Dear Ms. Ehsan:

Thank you for allowing the Department of Resources Recycling and Recovery (CalRecycle) staff to provide comments for this proposed project; and for your agency's consideration of these comments as part of the California Environmental Quality Act (CEQA) process.

The San Diego County Planning and Development Services Department, acting as Lead Agency, has prepared and circulated a Notice of Preparation for a Draft Environmental Impact Report (EIR) in order to comply with CEQA, and to provide information to, and solicit consultation with Responsible Agencies in the approval of the proposed project.

Project Description

The project is a recycling facility for tree waste chipping and grinding; the recycling of wood and construction debris ("C&D wood"); and the recycling of concrete, asphalt, and inert material from demolition projects ("CDI debris"). Only pre-sorted, non-contaminated tree trimmings, wood and construction debris would be accepted for processing and there would be no composting or acceptance of solid waste.

The proposed NCER facility would likely require permits for both a Medium Volume CDI facility, regulated by CCR Title 14, Division 7, Chapter 3.0, Article 5.9 Section 17383.5, and a Compostable Material Chipping and Grinding permit.

NCER is anticipated to produce two truckloads per day (approximately 48 tons per day, 15,000 net tons annually) of finished product. The daily maximum combined process tonnage of C&D wood debris and/or CDI debris allowed by the Local Enforcement Agency (LEA) is 174 tons.

The proposed project consists of a 12,000-square foot steel building, 100,000 gallon water tank, a security trailer, truck scales, and up to twenty (60 feet by 60 feet by 18 feet high) adjustable storage containers.

The facility would operate six days a week, Monday through Saturday, from 5:00 AM to 7:00 PM. The project is located at 25568 Mesa Rock Road in the North County Metropolitan Subregional Plan Area (Twin Oaks Sponsor Group Area) within the unincorporated area of San Diego County. The project site



encompasses six commonly owned separate parcels of real property identified as San Diego County Assessor Parcel Numbers (APNs) 187-100-23, 187-100-31, 187-100-33, 187-100-35, 187-100-37, and 187-100-38.

Solid waste permits are required by the County Local Enforcement Agency (LEA) in conformance with state and county regulations. A Site Plan is required in conformance with the County Zoning Ordinance and a Habitat Loss Permit is required in conformance with the Natural Communities Conservation Planning Act.

The project also includes a Boundary Adjustment between APNs 187-100-35 and 187-100-37 to provide a buffer to residential property. Combined, the project site totals 139.5 gross acres (135.6 net acres). The proposed NCER Recycling Facility would be constructed on a 35.5 acre parcel in the southeast corner of the site.

Regional access is provided by I-15 to the Deer Springs Road exit and local access to the site is provided by a private easement road via Mesa Rock Road. Fire protection services would be provided by the Deer Springs Fire Protection District, potable water would be provided by the Vallecitos Water District, and an onsite septic system is proposed.

Comments

Project Description

The project description states that there would be no composting or acceptance of solid waste. Please note that the definition of solid waste means all putrescible and nonputrescible solid, semisolid, and liquid wastes, including garbage, trash, refuse, paper, rubbish, ashes, industrial waste, demolition and construction wastes, etc, pursuant to Public Resources Code Section 40191.

The project description includes a tree waste chipping and grinding activity, but no details on this part of the project are provided. Additional information on the tree waste chipping and grinding activity should be provided in the project description and potential impacts analyzed in the EIR (e.g., types of waste (only tree waste or other green materials as defined in Title 14, California Code of Regulations (CCR), Section 17852(a)(21)), days and hours of operation, equipment, peak daily tonnage, total capacity, storage, etc.).

Days and Hours of Operation

In the EIR, be clear as to what the hours of operation are for specific activities such as the receipt of material, transferring of material, processing of material, removal of material, and site maintenance. Be specific regarding what tasks may be performed during those hours, especially the difference between office hours open to the public and operational hours closed to the public. When considering a proposed permit, CalRecycle looks for specific limitations to hours/days of operations associated with the various functions.

Boundaries between CDI Recycling and Chip and Grind Operations

For purposes of inspection and enforcement, how will the sites (tree waste chipping and grinding and C&D wood/CDI debris) be clearly separated into discrete operational units? No physical boundary is shown. Will the site be permitted separately and have mutually exclusive permit requirements or all solid waste handling activities under one permit? There are issues associated with multiple solid waste permits being issued to the same site and address, and the topics should be explored in the EIR to determine if any of the issues have environmental impacts, cumulative impacts, or are of concern for enforcing mitigation measures. See Permits comment below.

Storage Timelines and Tonnages

The EIR should identify the storage timelines for different material types and in the different stages of processing (incoming feedstock, processing material, and finished products) that will be stored on site. The EIR should discuss the environmental impacts associated with the materials if they are allowed to sit longer than the regulations and permit conditions allow, such as fire danger, vector and odor nuisances. According to site drawings, piles may be located outdoors in non-specific configurations within the boundaries of the yard, and that processed material may be put in a variety of container types or directly on the slab/ground. The assumptions, methods, and calculations in determining the total design capacity of the facility should be described in the EIR. Specifications in the design and operation of all of the solid waste handling activities should be described and the facility(ies) can address the potential environmental impacts, or mitigation measures can be developed if necessary.

Waste Streams

The EIR should indicate the types of waste to be accepted as well as those types of waste to be prohibited/excluded. Also, note that for the facility(ies) to be considered a recycler rather than a transfer/processing facility, it must meet the three part test as provided in 14 CCR, section 17402.5:

1. Incoming material has less than 10% residual solid waste;
2. Incoming material has less than 1% putrescible waste; and
3. Incoming material has been source separated before entering the facility.

Communications On-Site

Due to the site location in proximity to canyon geological features, there may be concerns about verbal communication. Take care to develop a system that is the most effective mode of communication and that meets state minimum standards.

Permits

The San Diego County Department of Environmental Health (as the Local Enforcement Agency or LEA) and CalRecycle are responsible for providing regulatory oversight of solid waste handling activities, including permitting and inspections. The permitting and regulatory requirements for compostable material chipping and grinding, and construction demolition and inert debris handling are contained in Titles 14 and Title 27 CCR. The LEA contact for this proposed project is KariLyn Merlos, and can be reached at 858-495-5799 or by e-mail at KariLyn.Merlos@sdcounty.ca.gov. The project proponent should work closely with the LEA during the permitting process for the proposed project, and both the LEA and CalRecycle may have further comments after analyzing the EIR.

Guidance to assist the lead agency in preparation of CEQA documentation for a composting facility and transfer station (similar for a CDI debris facility) are available on CalRecycle's web page at:

<http://www.calrecycle.ca.gov/SWFacilities/Permitting/CEQA/Documents/Guidance/Compost.htm>

<http://www.calrecycle.ca.gov/SWFacilities/Permitting/CEQA/Documents/Guidance/Transfer.htm>

Conclusion

CalRecycle staff thanks the Lead Agency for the opportunity to review and comment on this environmental document and hopes that this comment letter will be useful to the Lead Agency in carrying out their responsibilities in the CEQA process.

October 13, 2014

CalRecycle staff requests copies of any subsequent environmental documents, copies of public notices, and any Notices of Determination for this project. Refer to 14 CCR, Section 15094(d) that states in part:

If the project requires discretionary approval from any state agency, the local lead agency shall also, within five working days of this approval, file a copy of the notice of determination with the Office of Planning and Research [State Clearinghouse].

If the environmental document is adopted during a public hearing, CalRecycle staff requests ten days advance notice of this hearing. If the document is adopted without a public hearing, CalRecycle staff requests ten days advance notification of the date of the adoption and project approval by the decision-making body.

If you have any questions regarding these comments, please contact me at 951.782.4176 or by e-mail at megan.fisher@calrecycle.ca.gov.

Sincerely,



Megan Fisher, Environmental Scientist
Integrated Waste Management Specialist
Permitting and Assistance Branch
Waste Permitting, Compliance and Mitigation Division
California Department of Resources Recycling and Recovery

cc: Office of Planning and Research,
State Clearinghouse

Virginia Rosales, CalRecycle
Virginia.rosales@calrecycle.ca.gov

KariLyn Merlos, San Diego County
Department of Environmental Health
KariLyn.Merlos@sdcounty.ca.gov



201 Vallecitos de Oro • San Marcos, California • 92069-1453 Telephone (760) 744-0460

October 9, 2014

County of San Diego – Attn: Planning & Development Services
5510 Overland Avenue, Suite # 310, San Diego, CA 92123

RE: Case #: PDS2008-3500-08-015, PDS2013-BC-13-0019
Log #: PDS2008-3910-08-08-012
APN's 187-100-23, 31, 33, 35, 37 and 38
North County Environmental Resources Recycling Facility (NCER)

General

The above referenced project is within the boundaries of the Vallecitos Water District and is eligible for service. Service will be provided under the rules and regulations of the District, under normal operating conditions after all required fees have been paid and all conditions of the District have been satisfied.

The project, as submitted, proposes a recycling facility for tree waste chipping and grinding; the recycling of wood and construction debris; and the recycling of concrete, asphalt, and inert material from demolition projects. The current land use is considered Rural Residential (.125-1.0 du/ac) for parcels 187-100-37 & 38 and Hillside Residential (.05-.25 du/ac) for parcels 187-100-23, 33 & 35 in the District's 2008 Master Plan. Parcel 187-100-31 is considered Open Space/Vacant. The proposed land use is Light Industrial which is considered a change in density for this area. A water and sewer study will be required to assess the impacts of the development and provide any necessary mitigation measures which will be required prior to District approval of the project.

Any existing District pipelines located within the boundaries of the project that are in conflict with the proposed development will require relocation within the public right-of-way or District easements. District policy requires that all newly created parcels have frontage on the District main and extensions of facilities to serve each newly created parcel will be required. The exact location of the main line extensions and relocation will be determined during the design phase of the project.

Water or Sewer facilities not within the public right-of-way will require a minimum 20-foot easement granted to the District. The District may require additional easements through the project or private properties for future extensions. The owner of the project is responsible for obtaining any easements including expenses incurred. Joint use of these easements is not allowed by the District and easements for storm drain and other facilities

should be analyzed early so that adequate sizing of easements for all facilities and various agencies is provided.

No structures will be allowed over District facilities. This includes but is not limited to, walls, entrance medians, landscaping, gates, guard house structures, curbs and gutters, or driveways that will be constructed over District facilities.

Water Service

The property is located within a pressure zone (source of water for fire protection and domestic use) which maintains a hydraulic gradeline (HGL) of 1,235 feet above sea level (msl). For protection of District facilities, any areas with water pressures near or higher than 150 psi will require water pressure regulators before the meter.

The proposed project includes six parcels. Four of the six parcels have frontage on a District main. There is an existing 1½ -inch water meter that currently serves parcel 187-100-23. The service line is connected to an 8-inch ACP (asbestos cement pipe) located on Mesa Rock Rd. District policy requires that a parcel of land shall have frontage on a District main prior to service being available. District water facilities are currently not fronting parcels 187-100-35 and 187-100-37. The distance to parcel 187-100-37 from the existing main is approximately 1280 LF. The distance to parcel 187-100-35 from the existing main is approximately 610 LF. The main line would need to be extended in order to service either of these parcels. Additionally, it should be noted that customers within the 1235 zone are currently being charged pumping fees and is anticipated that these fees will increase due to rising utility costs.

The project will not require a Water Supply Assessment (WSA).

Fire Flow Requirements

The Fire Department should be contacted to verify fire flow requirements and location of fire flow facilities required for the proposed project. A hydraulic analysis prepared by the District will be required to determine the available fire flow for the project. The owner/developer is responsible for all costs incurred in obtaining the hydraulic analysis. Looping or upgrades to the existing facilities both onsite and offsite may be required based on results of the Fire Flow Analysis. It is recommended that the hydraulic analysis be completed early in the process so not to cause any delay in the design and plan check process.

Sewer Service

The property is not within the District sewer service area. Sewer service will only be provided under the rules and regulations of the District, under normal operating conditions

Case #: PDS2008-3500-08-015, PDS2013-BC-13-0019

October 9, 2014

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and after all required fees have been paid and all conditions of the District have been satisfied. The annexation of the proposed project into the District's sewer service area would be required.

There are no existing District sewer facilities currently available on the frontage of the six parcels in the proposed project. The closest existing facilities are located in Rock View Glen at a distance of approximately 4,500 LF. Contact the San Diego County Department of Environmental Health Services for information regarding private septic systems.

Conclusion

All pipe clearances and crossings must adhere to the standard utility rules per the State of California, County of San Diego - Department of Environmental Health.

The District adopted Ordinance No. 162 on May 6, 2009. Ordinance No. 162 identifies various water conservation measures as they relate to current and future drought conditions including the curtailment of availability letters and limiting new service connections at level 3. The Vallecitos Water District has currently declared drought level 2.

This letter is issued for planning purposes only, and is not a representation, expressed or implied that the District will provide service at a future date. The Vallecitos Water District relies one hundred percent on imported water supplies. Water may not be available at the time the project is built. Commitments to provide service are made by the District Board of Directors and are subject to compliance with District fees, charges, rules and regulations.

Sincerely,



VALLECITOS WATER DISTRICT

Ingrid Stichter

Engineering Technician II

cc: Ken Gerdes, Director of Engineering and Operations
James Gumpel, District Engineer
Rob Scholl, Sr. Engineer Development Services



TWIN OAKS VALLEY COMMUNITY SPONSOR GROUP

P.O. Box 455

San Marcos, Ca. 92079

October 9, 2014

Maggie Loy
County of San Diego
Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

RE: North County Environmental Resources PDS2008-3500-080-015; PDS2013-BC-13-0019; PDS2008-3910-08-08-012
NOP Comments

Dear Maggie Loy,

The Twin Oaks Valley Community Sponsor Group would like to thank you for the opportunity to comment on this Notice of Preparation. As the County is aware, there has been a lot of Community involvement with this project and our Group has been following this project from its beginnings. We ask that the EIR for the North County Environmental Resources (NCER) consider the following:

1. During the General Plan update the Twin Oaks Valley Community Sponsor Group was opposed to the rezone of this site to High Intensity Industrial because the site is close to residential uses and is in an aesthetically important area along the I-15 corridor. We felt the change to High Impact Industrial was a Spot Zoning as defined by *"The granting to a particular parcel of land a classification concerning its use that differs from the classification of other land in the immediate area."* We were concerned because it appeared to be an *arbitrary, capricious, and unreasonable treatment of a limited area for the benefit of a single property owner.*
2. We ask that the EIR address the impacts of the zoning change and to provide clear legal justification for the zoning change so the public can be assured the zoning, which allows for this project, is appropriate, and the change to High Impact Industrial was done legally.
3. The EIR should evaluate at least three project alternatives that consider placing the project in existing industrial parks where these activities are allowed. Escondido, Vista and San Marcos have industrial parks zoned for the use that is being proposed

on this site. These industrial parks have been designed to accommodate the traffic, odors, noise, waste water treatment and other issues that will occur from this type of activity. In addition, due to the economic problems of the last six years, some of these parks have many large vacant buildings.

Air Quality:

- a. The EIR needs to study impacts from activities being planned for the site as well as cumulative impacts, both off site and on site of vehicular traffic that will be used to run the industrial operations. Activities such as rock crushing and unloading of material may have significant negative impact on residents. In addition, the large trucks being used to transport material to and from the site will add pollutants both from diesel exhaust and from the material being transported.
- b. Also, wind currents in the area may spread pollutants far beyond the site, negatively impacting nearby residents. The EIR should include a wind and microclimate study to look at how air borne particles from the site and from trucks being used for the operation, could impact adjacent residential properties.
- c. Many of the people who live near the site, such as those living in the Deer Springs Mobile Home Park, are elderly and likely have respiratory health issues that will be exacerbated by the airborne pollutants created by this project. The EIR should provide data identifying the different pollutants from the project, list how it may impact nearby residents and other businesses, and provide adequate mitigation to eliminate project impacts.
- d. Finally, the EIR should define what methods will be use to ensure mitigation measures are being followed. The community is experiencing problems with uncovered loads, dust, noise and speeding from trucks traveling to and from the quarry located on North Twin Oaks Valley Road. No enforcement measures are being used by the County. The public needs to be assured that there is sufficient mitigation and enforcement measures in place for the NCER project to prevent problems the community now experiences from the quarry, which is another form of high-impact industrial activity. The EIR needs to identify who will enforce these measures and prove they can do so. The EIR should study the use of a bond or other financial mechanism to pay for independent enforcement.

Will the trucks be covered when they are arriving and leaving the site? (legally they are supposed to but we need the EIR to tell us how it will be enforced).

Noise:

- a. The Twin Oaks Valley Community Sponsor Group is very concerned with the hours of operation, and why they are so long? They are from 5 am to 7 pm Monday thru Saturday. Since most business start at 7 am and close around 4:00 or 5:00 pm and the truck scales do not even open until 7 am, we are concerned independent truckers bringing material into the site will use the early hours to bypass weigh scales, and other legal requirements designed to protect the public. The EIR needs to explain this issue in detail and answer the following: What type of business will they be conducting at such an early hour? What type of noise will this generate? We are concerned this will be a real hardship for the neighbors near this project, or residential neighborhoods that will get truck traffic from this project. Will residents near the site

be listening to large trucks idling as they are staging before 5 am to enter the site? There is a noise ordinance that needs to be adhered to. It starts at 7 am.

- b. The EIR needs to address how the project will be able to adhere to the Noise Ordinance with the type of demolition such as rock crushing, blasting, etc., that they will be conducting. If the project cannot follow the noise ordinance the EIR needs to identify why it can't.
- c. The EIR should identify what the containers used for transportation of material will be made of. Will they be metal containers? The neighbors will be exposed to the constant "clanging" every time something is dumped into the containers.
- d. The EIR should consider mitigation measures such as building a sound wall and/or using rubberized road surface to help reduce noise created by the project.

Environmental Hazards:

Another concern is how hazardous waste will be handled. We have been told at past meetings that workers at the project site will be visually inspecting each load as it enters. However, this is no guarantee that hazardous materials will be missed. Who is to say that the hazardous materials are not going to be placed in the center of the load where they will not be detected. What happens if they are then detected after the load has been dumped and the dumping party has left the site? The EIR needs to identify how this will be addressed and what checks and balances will be used to ensure compliance.

Fire Plan:

The NOP states that C&D mulch can stay on site for 90 days. Our fear is for a mulch fire on site. Last year there were several mulch fires around the county and they burned for days. The EIR needs to include a discussion of how will the Fire Plan address and provide detailed mitigation measures. If one of the mitigation measures involves the use of water to keep the mulch pile cool so that it won't ignite, then the EIR should identify the amount of water needed and how that will be acquired given the ongoing drought status.

Water:

The project stands to use a tremendous amount of water. We are in a severe drought with no relief in sight. The EIR needs to study if there will be water available and how its use for this project may reduce the amount of water for other agricultural and residential uses.

Traffic:

According to the NOP, the project is only allowed two outbound trucks per day. The EIR needs to identify if this will be a single truck load or a truck with multiple beds, each carrying a load.

Other Issues:

We are concerned that this project won't be economically feasible. The EIR needs to provide a long-range business plan for the project so the public is assured taxpayers won't be on the hook should the project fail, leaving behind a site that requires millions to clean up.

The EIR should also address how the proposed project could damage property values and adjacent properties that are zoned residential. The devaluation of property value will cause a decline in the comparison value or “comps” for people who are trying to sell their property who may not even live next to the site. The EIR needs to study industrial activities of this type that have impacted neighborhoods in the past so the public can be assured the neighborhood will not become blighted. The EIR should also study how this project will impact the Community Character.

The project applicant is notorious for not getting the appropriate licenses. The Community is aware of this and is quite skeptical that he will adhere to the rules and conditions he needs to follow. The Community is also concerned with “piece-mealing” where the applicant understates his project to get approval and then after approval increases his capacity.

Thank you for listening to our concerns regarding this Notice of Preparation.

Sincerely,

Sandra Farrell
Chair, Twin Oaks Valley Community Sponsor Group
Karen Binns
Vice Chair, Twin Oaks Valley Community Sponsor Group

Cc: Beth Ehsan

California Home

Thursday, October 16, 2014

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North County Environmental Resources (NCER) Recycling Facility

SCH Number: 2014091033**Document Type:** NOP - Notice of Preparation**Project Lead Agency:** San Diego County

Project Description

The project is a recycling facility for tree branches and logs; wood and construction debris; and concrete, asphalt, and inert material (CDI) from demolition projects. Only pre-sorted, non-contaminated tree waste, wood and construction debris would be accepted for processing and there would be no composting or acceptance of solid waste. NCER is anticipated to produce two truckloads per day (approximately 48 tons per day, 15,000 net tons annually) of finished product.

Contact Information

Primary Contact:

Beth Ehsan
San Diego County
858 694 3103
5510 Overland Avenue, Suite 110
San Diego, CA 92123

Project Location

County: San Diego
City: Escondido
Region:
Cross Streets: Mesa Rock Road and Deer Springs Road
Latitude/Longitude: 33° 10' 9" / 117° 6' 44" [Map](#)
Parcel No: 187-100-23, 187-100-37, 187-100-38
Township: 11S
Range: 2W
Section: 32
Base: SBB&M
Other Location Info:

Proximity To

Highways: I-15
Airports: No
Railways: No
Waterways: No
Schools: 11
Land Use: High Impact Industrial (I-3), M54

Development Type

Industrial

Local Action

Site Plan, Other Action (BA/CC)

Project Issues

Aesthetic/Visual, Air Quality, Biological Resources, Noise, Toxic/Hazardous, Water Quality, Other Issues (GHGE)

Reviewing Agencies (Agencies in **Bold Type** submitted comment letters to the State Clearinghouse)

Resources Agency; Department of Parks and Recreation; **Resources, Recycling and Recovery**; Department of Fish and Wildlife, Region 5; **Native American Heritage Commission**; California Highway Patrol; Caltrans, District 11; Air Resources Board, Major Industrial Projects; Department of Toxic

Substances Control; Regional Water Quality Control Board, Region 9

Date Received: 9/12/2014 **Start of Review:** 9/12/2014 **End of Review:** 10/13/2014

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